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Shire Laboratories Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

SHIRE LABORATORIES INC.,	:	CIVIL ACTION NO.: 03-4436 (MLC)
	:	Plaintiff,
	:	(Hon. John J. Hughes, U.S.M.J.)
	:	Motion Return Date: October 3, 2005
v.	:	PLAINTIFF'S NOTICE OF MOTION
	:	TO AMEND THE SCHEDULING
	:	ORDER TO ALLOW
	:	LIMITED ADDITIONAL
	:	<u>EXPERT DISCOVERY</u>
NOSTRUM PHARMACEUTICALS, INC.,	:	
	:	Defendant.
	:	<i>Document Electronically Filed</i>

PLEASE TAKE NOTICE that the undersigned attorneys for plaintiff Shire Laboratories Inc., ("Shire"), shall move before the Honorable John J. Hughes, U.S.M.J., United States District Court, Clarkson S. Fisher Federal Building and U.S. Courthouse, 402 E. State Street, Trenton, New Jersey 08608, on October 3, 2005 at 10:00 a.m. or as soon thereafter as counsel may be

heard, for an Order to Amend the Scheduling Order to Allow Limited Additional Expert Discovery.

In support of its Motion, plaintiff Shire shall rely upon its letter brief, submitted concurrently herewith, and all pleadings of record. A proposed form of Order is also submitted herewith for the Court's consideration.

Plaintiff Shire respectfully requests oral argument on the return date of the Motion herein.

Respectfully submitted,

SAIBER SCHLESINGER SATZ & GOLDSTEIN, LLC
Attorneys for Plaintiff
Shire Laboratories Inc.

/s/ Arnold B. Calmann
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Dated: September 1, 2005

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

SHIRE LABORATORIES INC.,	:	CIVIL ACTION NO.: 03-4436 (MLC)
Plaintiff,	:	(Hon. John J. Hughes, U.S.M.J.)
v.	:	<u>CERTIFICATE OF SERVICE</u>
NOSTRUM PHARMACEUTICALS, INC.,	:	<i>Document Electronically Filed</i>
Defendant.	:	
	:	

ARNOLD B. CALMANN hereby certifies as follows:

I am an attorney-at-law of the State of New Jersey and a partner of the firm Saiber Schlesinger Satz & Goldstein, LLC, attorneys for Plaintiff Shire Laboratories Inc. in the above captioned action. I hereby certify that, on this 1st day of September, 2005, I caused the following documents to be electronically filed with the Clerk of the Court:

1. Notice of Motion to Amend the Scheduling Order to Allow Limited Additional Expert Discovery;

2. Letter Brief in Support of Motion with Exhibits; and
3. Proposed Order.

I hereby further certify that I caused true and correct copies of same to be served by electronic mail on September 1, 2005 to the following:

Gregory D. Miller, Esq.
**PODVEY, SACHS, MEANOR, CATENACCI
HILDER & COCOZIELLP, P.C.**
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I certify that the foregoing statements made by me are true and that if any of the statements made by me are willfully false, I am subject to punishment.

/s/ Arnold B. Calmann
ARNOLD B. CALMANN

Dated: September 1, 2005